<u>REMARKS</u>

The above Amendments and these Remarks are in reply to the Office Action mailed February 27,

2003. An appropriate Petition for Extension of Time to Respond is submitted herewith, together with the

appropriate fee.

Claims 1, 3, 4 and 6-16 were pending in the Application prior to the outstanding Office Action. In the

Office Action, the Examiner rejected claims 1, 3, 4 and 6-16. The present Response amends claims 1, 3, 4 and

6-16, leaving for the Examiner's present consideration claims 1, 3, 4 and 6-16. Reconsideration of the

rejections is requested.

RESPONSE TO REJECTION UNDER 35 USC §101

The Examiner rejected claims 1, 3, 4 and 6-16 under 35 USC §101 because the claimed invention is

directed to non-statutory subject matter. The Examiner stated that the invention as recited in claims 1, 3, 4 and

6-16 was an abstract idea that is not in the technological arts. Examiner further states that since the subject

claims do not indicate the use of a computer or other technological means to carry out the steps as disclosed in

the claims, a reasonably broad interpretation of the claim renders it outside the technological art and therefore

the claims are analyzed as being non-statutory.

Applicant has amended the claims 1, 3, 4 and 6-16 to more clearly recite one embodiment of the

present invention wherein the method of the invention is carried out utilizing a computer program product.

Applicant reserves the right to reintroduce the original claims in subsequent continuation or divisional

application. Applicant respectfully submits that pending claims 1, 3, 4 and 6-16 are directed to the display of

information utilizing a computer program product.

Examiner further stated that claims 1, 3, 4 and 6-16 comprised "a series of steps to be performed

presumably on a computer." Applicant's amendment of the claims more clearly recite one embodiment of the

present invention wherein the claim elements are performed by a computer. Thus, the analysis presented by

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the Examiner regarding steps performed on a computer as a post-computer process activity or pre-computer

process activity do not apply to the claims as amended.

Examiner further stated that claims 1, 3, 4 and 6-16 recite the limitation "identifying an anchor point",

and that the term "identifying an anchor point" is abstract since one cannot define in concrete and tangible

terms what defining an anchor point is. On page 8, lines 3-5, an anchor point is defined as being any point on

a map and envisioned to represent multiple locations or all locations within a geographic area. Applicant

submits the limitation and/or term "identifying an anchor point" is defined for the purposes 35 USC §101.

For at least the reasons stated above, Applicant respectfully submits that the claims overcome the

rejection under 35 USC §101 and requests the rejection be withdrawn.

**RESPONSE TO REJECTION UNDER 35 USC §112** 

Examiner states that claim 1 recites limitations without reciting an element that accomplish the

limitations. Applicant has amended claims 1, 3, 4 and 6-16 to more clearly recite an embodiment of the

present invention, wherein the invention is performed utilizing a computer program product. Thus, the steps

recited in claim 1 are performed by computer program product code. Applicant reserves the right to

reintroduce the original claims in subsequent continuation or divisional application. Applicant respectfully

submits the amended claims overcome the rejection under 35 USC §112 and requests the rejection be

withdrawn.

**RESPONSE TO REJECTIONS UNDER 35 USC §103** 

The Examiner rejected claims 1, 3, 4 and 6-16 under 35 USC §103(a) as being unpatentable over

United States Patent No. 6,101,496 (AEsposito@). Examiner states that Esposito discloses a identifying an

anchor point (col. 1, lines 24-35 and col. 4, lines 9-17) and defining at least one radial extending from the

anchor point (col. 7, lines 12-53 and FIG. 6). Examiner further states that Esposito discloses a radial (a line)

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extending from an anchor point (a star) in FIG. 5. Applicants respectfully traverse the rejection based on

Esposito.

Esposito discloses a method of improving geocoding interpolation by combining ordered data with

prior geocoded data to locate addresses on a map. As shown in FIG. 3-1, OI data records 22 are compared

against an existing georeferenced library 32. Esposito then classifies the assignment of the address location to

one of a group of classification headings, from best case location assignment to unmatched. "The OIID

[Ordered Information Identification Tags] and Census FIPS data [...] are added to existing records." (col. 4,

line 67 to col. 5, line 5).

Esposito does not disclose defining a radial extending from an anchor point or associating at least one

item relating to said anchor point with said radials. To the contrary, FIG. 6 discloses several street segments,

as indicated by the key in the lower left hand corner of FIG. 6. The street segments are portions of a street to

which addresses can be assigned using interpolation. Radials are not street segments. Though the Examiner

cited nearly the entire column 7 in reference to FIG. 6, nowhere in column 7 does Esposito disclose a radial

extending from an anchor point.

Furthermore, Esposito does not disclose a radial ("a line" as stated by Examiner) extending from an

anchor point ("a star" as stated by the Examiner) in FIG. 5. Similar to FIG. 6, the key indicates that the line is

an actual Campbell Drive street segment. Unlike a radial, the street segment is placed on the map along the

particular street. As discussed above and known by those skilled in the art, radials are not street segments. For

at least the reasons stated above, Applicants submit that it would not be obvious to one skilled in the art at the

time the invention was made to modify Esposito to arrive at the invention as claimed in claim 1.

Claims 3, 4 and 6-16 are dependent on claim 1 and therefore allowable for the reasons stated above in

addition to the distinguishing elements they recite. Additionally, since Esposito does not disclose the concept

of a radial as discussed above, Esposito does not disclose the invention as claimed in claim 3, 6, 9, 10, 12, 13

and 16 which recite limitations regarding a radial. Applicant further submits that it is not obvious to arrive at

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the satellite limitations recited in claims 8 and 9 based on Esposito, as Esposito does not teach, hint or suggest

any technical matter related to satellite mapping nor is Esposito in the same technical field as satellite mapping.

Furthermore, Esposito clearly does not disclose assigning a direction to each respective radial as recited in

claims 12 and 13 and calculating an endpoint for each respective radial in claim 12 by the street segments

illustrated in FIG. 5, 6 and 7 and the corresponding text cited by the Examiner. Applicant further submits that

it would not be obvious to have a margin of error in Esposito "because such a modification would allow

Esposito to have at least one margin of error" as stated by the Examiner on page 9 of the Office Action.

As discussed above, independent claim 1 recites the elements discussed above that distinguish the

claimed invention from Esposito. Claims 3, 4 and 6-16 all directly or indirectly depend from independent

claim 1 in addition to containing additional distinguishing elements not disclosed by Esposito. Therefore,

Applicants respectfully submit that the claims are now in position to overcome this rejection and requests the

rejection be withdrawn.

The references cited by the Examiner but not relied upon have been reviewed, but are not believed

to render the claims unpatentable, either singly or in combination.

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## Conclusion

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application should be allowable, and a Notice of Allowance is requested. The Examiner is respectfully requested to telephone the undersigned if he can assist in any way in expediting issuance of a patent.

Enclosed is a PETITION FOR EXTENSION OF TIME UNDER 37 C.F.R. § 1.136 for extending the time to respond up to and including June 27, 2003.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: June 27, 2003

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